

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

WILLIAM SCARBOROUGH
6317 Posey Street
Frederick, Maryland 21703

Plaintiff

vs.

MONIQUE SPARKS
1150 Holden Road
Frederick, Maryland 21701

Defendant

C-10-FM-23-001596

Case No.

PLAINTIFF'S COMPLAINT FOR ABSOLUTE DIVORCE

TO THE HONORABLE JUDGES OF SAID COURT:

The Plaintiff, WILLIAM SCARBOROUGH, by and through his Attorney, Manuel D. Machin, Esq. of The Machin Law Firm, LLC, respectfully represents unto this Honorable Court as follows:

1. Plaintiff is an adult citizen of the United States and a resident of Frederick County, Maryland in which County and State Plaintiff has resided for more than (6) months prior to the filing of this action.
2. The Defendant is likewise a resident of Frederick County, Maryland in which County and State Defendant has resided for more than six (6) months prior to the filing of this action.
3. The grounds for divorce occurred in the State of Maryland in Frederick County.
4. The parties hereto were married on March 7, 2023 in Frederick, Maryland and are now Husband and Wife.
5. That no children were born as issue of this union.

6. The parties separated on August 18th, 2023.

7. The Plaintiff has no knowledge of any other proceeding pending in a Maryland court or in any other court concerning the minor children.

8. The parties have not acquired any real or personal property during the marriage that qualifies as marital property under Family Law Article, Annotated Code of Maryland, §8-201(e). Rather, the parties have split any remaining property and assets to their satisfaction. Except that Defendant is in possession of work tools which are solely property of the Plaintiff and for which the Plaintiff requests the Court ordered them returned or order Defendant to remit compensation.

9. Plaintiff has been a substantial contributor to said marriage, having performed all functions attributable to a husband.

10. Neither party is under any legal disability.

COUNT I - SEPARATION

11. Plaintiff hereby incorporates the allegations contained in Paragraphs one (1) – eleven (11) of his complaint.

12. Since August 18th, 2023, the parties have been living separate and apart, without interruption and without cohabitation.

13. There is no hope or expectation of reconciliation.

COUNT II – CONSTRUCTIVE DESERTION

14. The Plaintiff incorporates herein the allegations contained in paragraphs one (1) through fourteen (14).

15. The parties are now living separate and apart as a result of Defendant's actions throughout the marriage.

16. Defendant has deserted the Plaintiff by engaging in a course of conduct in which

she has failed to communicate with Plaintiff, failed to show respect and care for Plaintiff as a husband, failed to engage in familial discussion or events, is belittling and rude to Plaintiff, embarrasses Plaintiff in front of the parties' family, and has caused extreme mental anguish of the Plaintiff through overall emotionally abusive behavior.

17. Defendant has misappropriated funds, moved martial monies around without Plaintiff's knowledge and has committed financial abuse.

18. The Defendant has been verbally abusive toward the Plaintiff throughout the marriage.

19. The parties are not living as man and wife because of Defendant's cruel treatment which is inconsistent with the health, safety and self-respect of Plaintiff.

20. After the Plaintiff discovered Defendant's past life experiences which were never disclosed to him prior to or during marriage by the Defendant, which led to Defendant making good on her on her threat to file a protective order against the Plaintiff.

21. Defendant's actions have left Plaintiff no other choice but to dissolve the marriage in order to avoid continued conflict.

22. There is no reasonable expectation of reconciliation of this marriage.

WHEREFORE, Plaintiff requests:

1. That Plaintiff be awarded an Absolute Divorce from the Defendant or limited divorce in the alternative;

2. That Plaintiff be awarded Plaintiff's reasonable and necessary expenses including suit money, counsel fees and costs, initial, *pendente lite* and permanently, and that such award be reduced to judgment;

3. Pursuant to Maryland Code Family Article § 7-107(b) Order Defendant to pay

reasonable and necessary expense of prosecuting or defending the proceeding;

4. Pursuant to Maryland Code Family Article § 8-214 Order Defendant to pay reasonable and necessary expense of prosecuting or defending the proceeding .

5. Pursuant to Maryland Code Family Article § 11-110 Order Defendant to pay reasonable and necessary of prosecuting or defending the proceeding.

6. Pursuant to Maryland Code Family Article § 12-103 Order Defendant to pay reasonable and necessary expense of prosecuting or defending the proceeding.

7. That the Defendant be required to file Defendant's Answer to this Complaint under oath;

8. That this Court pass an Order reducing to judgment any monetary award granted unto the Plaintiff.

9. That Plaintiff be granted all relief to which Plaintiff may be entitled pursuant to the Family Law Article of the Annotated Code of Maryland;

10. That any such order for counsel fees be reduced to judgement in favor of the Plaintiff's counsel and on behalf of the Plaintiff;

11. And that Plaintiff be granted such other and further relief as to this Honorable Court may seem just and proper.

I solemnly affirm under the penalties of perjury that the contents of this Complaint for Absolute Divorce are true to the best of my knowledge, information, and belief.


William Scarborough (Sep 13, 2023 18:53 EDT)

Mr. William Scarborough

By: The Machin Law Firm, LLC

/s/ Manuel Machin, Esq.

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